IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA (Charlottesville Division)

QUALITY PROPERTIES ASSET MANAGEMENT COMPANY,)
Plaintiff, v.)) Case No. 3:11-CV-00053
TRUMP VIRGINIA ACQUISITIONS LLC and TRUMP VINEYARD ESTATES LLC, Defendants.) Judge Norman K. Moon) Magistrate Judge B. Waugh Crigler
TRUMP VIRGINIA ACQUISITIONS LLC and TRUMP VINEYARD ESTATES LLC,	
Counter-plaintiffs, v.)))
QUALITY PROPERTIES ASSET MANAGEMENT COMPANY, BANK OF AMERICA, N.A. and BEALE, DAVIDSON, ETHERINGTON & MORRIS, P.C.,))))
Counter-defendants.)

NOTICE OF MOTION

PLEASE TAKE NOTICE that on the telephonic hearing previously scheduled for March 9, 2012, at 9:30 a.m. before the Honorable B. Waugh Crigler, Defendants/Counter-Plaintiffs shall present their Motion To Stay Discovery Herein Pending The Court's Ruling On The Parties' Cross-Motions For Judgment On The Pleadings, which is filed contemporaneously herewith.

TRUMP VIRGINIA ACQUISITIONS LLC and TRUMP VINEYARD ESTATES LLC

Ву:	/s/ Stephen Novack	
	One of Their Attorneys	

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CERTIFICATE OF SERVICE

Stephen Novack, an attorney, certifies that he caused copies of the foregoing to be served
by electronically filing the document with the Clerk of Court using the ECF system this 7th day
of March 2012.

/s/	Stephen	Novack	